

Russell Biomass LLC  
52 Dexter Road  
Lexington, MA 02420

July 4, 2006

Mr. Robert Sydney  
General Counsel  
Division of Energy Resources  
100 Cambridge Street, Suite 1020  
Boston, MA 02114

Dear Mr. Sydney:

With this letter Russell Biomass LLC, the developer of a 50 MW biomass planned for Russell, MA, provides two comments on the proposed final regulations issued June 2, 2006.

1. We think it is absolutely essential to allow a stoker-fired boiler alternative as a qualifying RPS technology if the following requirements are met:
  - a. It is for a new plant and therefore achieves the legislative goal of stimulating new (additional) renewable energy and thus reducing dependence on fossil fuels.
  - b. It meets the RPS air emissions limits.

Allowing stoker-fired boilers will increase the amount of biomass energy long term for two reasons:

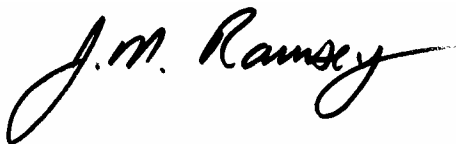
- A stoker-fired boiler plant is 6-8% more efficient than a fluidized bed plant, thus burning less fuel for the same kWh output, with corresponding lower air and transportation impacts.
  - Increased boiler vendor competition will result in greater cost competition, with an improvement in biomass plant economics, hence more investment at the margin.
2. Russell Biomass has decided without qualification to exclude Construction and Demolition wood as a fuel for our plant. This is the case even though C&D wood is permitted and safely burned in some other wood and solid waste plants. We have carefully evaluated it and have had extensive interactions with the public. Many members of the general public are greatly and understandably concerned about the potential for exceeding air emissions limits. Accordingly, we offer the following comment if DOER decides that C&D wood will be a qualified RPS fuel and can be burned in other biomass facilities. There must be specific documented requirements for (a) screening at the source, (b) initial and periodic testing of the plant emissions and (c) daily testing of the ash. Our suggestions for the testing consequences are:

- a. If the initial tests fail to meet the emissions or ash limits the C&D wood must be disallowed as a fuel until a delayed and subsequently scheduled test meets limits.
- b. If the subsequent test fails the wood should be permanently disallowed as a fuel in that plant.
- c. If during operations (following an initial successful test) an air emissions or ash test exceeds permit limits the C&D wood should be disallowed for 6 months, followed by a special test similar to the initial plant start-up test.
  - i. If unsuccessful, C&D wood should be permanently disallowed as fuel for that plant.
  - ii. If successful, and a subsequent air emissions or ash test fails within the following year, C&D wood should be permanently disallowed as a fuel for that plant.

The above apparently harsh consequences are necessary because C&D wood has the potential, if not properly sorted and screened at the source, to cause the air emissions and ash content limits to be exceeded. The suppliers and burners of C&D wood must clearly see that it is in their economic interests to continuously control the quality of the C&D wood stream.

If such tight testing controls and consequences are not enacted Russell Biomass recommends against including C&D wood as a qualified RPS fuel for any wood power plant.

Respectfully submitted,

A handwritten signature in black ink, reading "J.M. Ramsey". The signature is written in a cursive, flowing style with a large, sweeping "J" and "R".

James M. Ramsey, Development Partner  
Russell Biomass LLC